

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

HONUA SECURITIES CO., LTD., et al.)	
)	
Plaintiffs)	
)	
v.)	1:10 CV 0785-GBL-JFA
)	
SMI HYUNDAI CORP., et al.,)	
)	
Defendants.)	
)	
SMI HYUNDAI CORP.)	
)	
Counter-Plaintiff)	
)	
v.)	
)	
HONUA SECURITIES CO., LTD., <i>et al.</i>)	
)	
Counter-Defendants)	
)	

DEFENDANTS' RULE 26(a)(3) DISCLOSURES

NOW COME Defendant/Counterclaimant SMI Hyundai Corp., and Defendants American Federal Contractors, Inc., and Man Ki Kim ("Defendants"), by and through counsel, hereby submit their Pretrial Disclosures in accordance with Fed. R. Civ. P. 26(a)(3) and the Court's Scheduling Orders.

A. List of Witnesses

Defendants expect to present the following witnesses at trial:

1. Mr. Seung-Tae "Andrew" Jang
1601 Kapiolani Boulevard
Suite 910
Honolulu, HI 96814
(808)949-9988

2. Mr. Chee-Ho Shin
Norstar Asia LLC
Gangnam –gu, Seoul, Korea
3. Mr. Young-Lyul Kim
140 Gye-Dong
Chongro-gu,
Seoul, Korea 135-713
(82) 10-5321-8944
4. Mr. David M. Dale
3616 Ridgeway Terrace
Falls Church, VA 22044
(703) 658-4518
5. Mr. Christoph Penderok
Zurich, Switzerland/ Bonn, Germany
(49) 1712206926
(424)230-2400
6. Mr. Tong-Soo Chung, Esq.
Textile Center
12F, 944-31 Daechi 2-dong,
Gangnam-gu,
Seoul, Korea 135-713
(82) 2-528-5216
7. Mr. Man-Ki Kim
c/o Sang Kuen Park, Esq.
8. Herbert Kaupert Esq.
Karl-Carstens-straße 10,
3113 Bonn, Germany
(49) 228/90969

In addition, Defendants may call any witness identified by Plaintiffs.

By Deposition:

1. Seung Tae "Andrew" Jang

B. List of Exhibits

Defendants may offer any of the following exhibits as evidence at trial:

1. Credit Facility Agreement (Jang Dep. Exh. 1)
2. 11/29/07 Letter from Jang to Kim and Shin (Jang Dep. Exh. 2)
3. 11/15/07 Letter from Jang to Kim and Shin (Jang Dep. Exh. 3)
4. 10/20/07 email string between Jang and Kim (Jang Dep Exh 4)
5. 10/19/07 email from Kim to Jang with attached documents (Jang Dep Exh 5 along with electronic version)
6. 11/15/07 Email from Shin to Tirosh with attachment (Jang Dep Exh 6)
7. 1/15/08 Letter from Jang to Kim and Shin (Jang Dep Exh 7)
8. 1/28/08 email Jang to Kim (Jang Dep Exh 8)
9. Loan Agreement (Jang Dep Exh 9)
10. Letter of Commitment (Jang Dep Exh 10)
11. Record of Examination of Witness (Jang Dep Exh 11) with German original.
12. D45002-06 (SMI Dep Exh 14)
13. SMI Dep Exh 7
14. SMI Dep. Exh 17 without note at the top of pg. 1
15. D45007, SMI Dep Exh 18
16. SMI Dep. Exh 20
17. SMI Dep Exh 21
18. SMI Dep Exh 26
19. SMI Dep Exh 32
20. 1/14/08 Jang letter to Tirosh

Defendants also may rely upon any one or more documents on Plaintiffs' exhibit list.

STIPULATIONS

Defendants stipulate to all facts admitted in their Answers and in their responses to Plaintiffs' Requests for Admissions.

Dated: March 25, 2011.

Respectfully submitted,

/s/ Daniel M. Press

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Counsel for Defendant SMI Hyundai Corp.

/s/ Sang Kuen Park

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Annandale, VA 22003
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Fax: 703-941-6252
Counsel for Defendants AMERICAN FEDERAL
CONTRACTORS, INC., and MAN KI KIM

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of March, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Thomas E. Ullrich, Esq.
Daniel L. Fitch, Esq.
Wharton Aldhizer & Weaver
100 S Mason St
PO Box 20028
Harrisonburg, VA 22801

And I hereby certify that I will mail the document by U.S. mail to the following non-filing users:

None.

/s/ Daniel M. Press
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